

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
UTILITIES COMMISSION**

DOCKET NO. 2015-54-E

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**MOTION FOR ADMISSION
PRO HAC VICE**

The Alliance for Solar Choice ("TASC"), through its undersigned counsel, hereby moves the Public Service Commission of South Carolina ("Commission") to permit Thadeus B. Culley to practice pro hac vice before the Commission in the above-captioned matter.

Pursuant to SCACR 404, Mr. Culley, together with TASC's counsel of record, has filed a *Verified Application for Admission Pro Hac Vice* with the South Carolina Supreme Court. Attached hereto is a stamped copy of Mr. Culley's Verified Application, as it was filed with the Supreme Court.

WHEREFORE, as the provisions set forth in SCACR 404 have been satisfied, TASC request that this motion be granted.

Respectfully Submitted this 22nd day of April, 2015.

Joseph M. McCulloch, Jr.
Law Offices of Joseph M. McCulloch, Jr.
1426 Richland Street
Columbia, SC 29211
Tele: 803.779.0005
Fax: 803.779.0666
Email: joe@mccullochlaw.com

Counsel for The Alliance For Solar Choice

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
UTILITIES COMMISSION

DOCKET NO. 2015-54-E

IN RE: Petition of South Carolina)
Electric & Gas Company for)
Approval to Participate in a)
Distributed Energy Resource)
Program)

CERTIFICATE OF
SERVICE

The undersigned, Joseph M. McCulluch, Jr., Esquire, does hereby certify that he has served the persons listed below with a copy of the **MOTION FOR ADMISSION PRO HAC VICE** in the above-captioned proceeding by dispatching a copy to them via U.S. Mail or electronic mail at the addresses listed below on April 22, 2015.

PARTIES SERVED (including parties with pending intervention requests):

Stephanie U. Roberts
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Fax: 803-737-0895

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220 Operation Way - MC C222
Cayce, SC, 29033-3701
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Phone: 803-217-8141
Fax: 803-217-7810

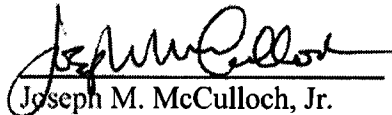
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Robert Guild , Counsel
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Columbia, SC, 29201

Email: bguild@mindspring.com
Phone: 803-252-1419
Fax: 803-252-1419

April 22, 2015
Columbia, South Carolina


Joseph M. McCulloch, Jr.

RECEIVED

APR 22 2015

S.C. JUDICIAL BRANCH

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA**

**IN RE: Petition of South Carolina Electric & Gas
Company for Approval to Participate in a
Distributed Energy Resource Program**

DOCKET NO. 2015-54-E

Public Service Commission of South Carolina

Mailing Address:

101 Executive Center Dr.
Suite 100
Columbia, SC 29210

Comes now Thadeus B. Culley, applicant herein, and respectfully represents the following:

1. Applicant resides at:

49 Oakwood Drive

Street Address

Chapel Hill

City

Orange

County

NC

State

27517

Zip Code

504-616-0181

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Keyes, Fox & Wiedman LLP, with offices at,

401 Harrison Oaks Blvd., Suite 100

Street Address

Cary

City

Wake

County

NC

State

27513

Zip Code

510-314-8205

Telephone

510-225-3848

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by The Alliance for Solar Choice to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since April of 2014, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of North Carolina where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

Supreme Court of California

December 2010

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

n/a

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

n/a

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

n/a

9. Local counsel of record associated with applicant in this case is Joseph M. McCulloch, Jr., of the Joseph M. McCulloch, Jr. law firm, which has offices at:

1426 Richland Street

Street Address

Richland

County

803-779-0005

Telephone

Columbia

City

SC

State

29211

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

n/a

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

South Carolina Public Service Commission Docket No. 2014-246-E (open), applied on August, 19 2014, associated with local counsel Joseph M. McCulloch, Jr., motion granted on August 27, 2014.

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 21st day of April, 2015.



APPLICANT

VERIFICATION

STATE OF NORTH CAROLINA)

COUNTY OF WAKE)

I, Thadeus B. Culley, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Thadeus B. Culley

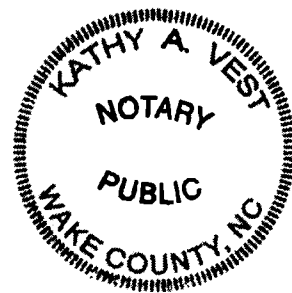
APPLICANT/AFFIANT

Subscribed and sworn to before me this 21 day of April 20 15.

Kathy A. Vest.

Notary Public for the State of NC

My Commission Expires: _____ **MY COMMISSION EXPIRES 5/6/2018**



LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 22 day of April, 2015.

Joseph McQuibban
LOCAL COUNSEL OF RECORD
Joseph McQuibban

Bar # 0003760



THE STATE BAR OF CALIFORNIA

MEMBER RECORDS & COMPLIANCE

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

April 7, 2015

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, THADEUS BARNABUS CULLEY, #271602 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2010; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kathan Lambert".

Kathan Lambert
Custodian of Membership Records

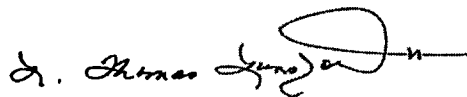
The North Carolina State Bar

I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby certify that Mr. Thadeus Barnabus Culley (47001) was licensed to practice law by the State of North Carolina on April 2, 2014. Said lawyer is presently an active member of the North Carolina State Bar and is eligible to practice law in North Carolina. Said lawyer is not subject to a pending order of administrative or disciplinary suspension. Said lawyer's financial account with the State Bar is current. Therefore, said lawyer is in good standing with the North Carolina State Bar.

This certificate is issued without regard to prior discipline, or any unresolved disciplinary charges or grievances.

Given over my hand and the Seal of the North Carolina State Bar, this

17th day of April, 2015.



Secretary of the North Carolina State Bar

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court via hand delivery to: South Carolina Supreme Court Office of Bar Administrations, 1231 Gervais Street, Columbia, South Carolina 29201, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 22nd day of April, 2015.



APPLICANT/AFFIANT